

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

DAVID J. BOSHEA

*

Plaintiff,

*

Case No. 1:21-CV-00309-ELH

v.

*

COMPASS MARKETING, INC.

*

Defendant.

*

* * * * *

**MOTION FOR EXTENSION TO FILE OPPOSITION TO NON-PARTY
MICHAEL R. WHITE’S MOTION FOR SANCTIONS**

Defendant Compass Marketing, Inc. (“Compass Marketing”), by and through its undersigned counsel, with the consent of Plaintiff David J. Boshea, respectfully requests that the Court extend the time for Compass Marketing to file an opposition to the Motion for Sanctions filed by Non-Party Michael R. White (“Michael White”) from June 6, 2024 to June 27, 2024. In support. Compass Marketing states as follows:

1. On May 23, 2024, Michael White filed an untimely and frivolous Motion for Sanctions seeking an Order from this Court sanctioning Compass Marketing and its counsel Stephen B. Stern, Heather K. Yeung, and Kagan Stern Marinello & Beard, LLC.¹
2. Any opposition or response to the Motion for Sanctions is presently due Thursday, June 6, 2024.

¹ Ms. Yeung’s appearance is no longer entered in this case, having been substituted for attorney Shannon Hayden on November 18, 2022. *See* ECF 123. Ms. Yeung has been informed about the Motion for Sanctions and this request for an extension of time to respond (and, to the extent that any response is required of Ms. Yeung, she joins in this request for an extension, as undersigned counsel plan to file any opposition on behalf of Ms. Yeung as well).

3. To the extent that the Court even requires an opposition to the Motion for Sanctions, Compass Marketing requests that the Court extend the deadline to oppose the Motion for Sanctions to June 27, 2024.

4. Counsel for Compass Marketing (both Mr. Stern and Ms. Hayden) are currently preparing for and are scheduled to begin a week-long trial in the Circuit Court of Maryland for Anne Arundel County on June 10, 2024 in the case captioned, *Whitsend III, Inc. (t/a Servpro of Annapolis) v. Heritage Mechanical, LLC, et al.*, Case No. C-02-CV-21-000497.

5. Additionally, counsel for Compass Marketing, Mr. Stern, will be attending his daughter's high school graduation on June 6, 2024, the date that an opposition is presently due.

6. Counsel for Plaintiff David J. Boshea has consented to extending the deadline to June 27, 2024.

7. A short three-week extension will not prejudice Michael White in any way, as Michael White has waited to file his frivolous Motion for Sanctions more than two years after he last filed anything in this case (other than his counsel's motion to withdraw, which was filed last week – a likely indication of counsel's refusal to file the frivolous Motion for Sanctions on behalf of Michael White).

WHEREFORE, Defendant Compass Marketing, Inc., respectfully request that this Court grant this Motion and extend the time for Compass Marketing, Inc. to file any opposition or response to the Motion for Sanctions to June 27, 2024.

Dated: May 23, 2024

Respectfully submitted,

/s/Stephen B. Stern

Stephen B. Stern, Bar No.: 25335

Shannon M. Hayden, Bar No.: 30380

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Counsel for Defendant

Compass Marketing, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of May, 2024, the foregoing Motion for Extension to File Opposition to Non-Party Michael R. White's Motion for Sanctions was served via the CM/ECF system on the following counsel of record:

Thomas J. Gagliardo
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*Attorneys for Plaintiff
David Boshea*

And by first-class mail, postage prepaid, on the following:

Michael R. White
39650 Hiawatha Circle
Mechanicsville, Maryland 20659

/s/ Stephen B. Stern
Stephen B. Stern